

EXHIBIT A

Case No. 2019L 001095

Circuit

John K. Coil)	In the District Court
Plaintiff)	Madison County, Illinois
John A. Coil)	_____ Judicial District
Defendant		

Plaintiff Original Petition:

To the honorable Judge of said court:

Now comes John K. Coil, an individual who resides at 531 East 8th Street, Alton, Madison County, Illinois complaining of John A. Coil, an individual whose legal residence is 100 North Wood River Avenue, Wood River, Madison County, Illinois herein after called Defendant and for cause of action show unto the court the following:

I. Parties and Service

1. Plaintiff, John K. Coil, individual whose legal residence is Madison County, Illinois.
2. Defendant, John A. Coil, individual maintains a legal address and can be served at 100 North Wood River Avenue, Wood River, Illinois 62095. John A. Coil maintained a legal address at 2011 Cedar Springs, Unit 405, Dallas, Texas 75201 from 2007 until February 2017 when he moved to 3426 North Elizabeth Street, Pueblo, Colorado 81008. John A. Coil moved from 3426 North Elizabeth Street, Pueblo, Colorado 81008 to 4137 Ann Street, Ft. Collins, Colorado 80526 in September 2017, but continued to receive his mail at the Pueblo, Colorado Address. At the end of September 2018 John A. Coil moved all of his belongings to 100 North Wood River Avenue, Wood River, Illinois. John A. Coil lived on a day-to-day basis at 100 North Wood River Avenue, Wood River, Illinois until February 2019. John A. Coil still has all of his belongings and gets his mail at 100 North Wood River Avenue, Wood River, Illinois. In February 2019, John A. Coil began travelling from California to Florida, and as far north as New York State. John A. Coil suffers from paranoid schizophrenia, and does not let even close family members know where he is. John A. Coil can be served at 100 North Wood River Avenue, Wood River, Illinois 62095, or wherever he may be found. Service of said Defendant can be affected by personal delivery.

II. Jurisdiction and Venue

3. This court has subject matter jurisdiction because the matter in controversy exceeds this courts' minimum jurisdictional limits.

4. Personal jurisdiction is proper in this matter because the Plaintiff and defendant are both legal residents of Madison County, Illinois.

III. Facts

5. Defendant stole a check in the amount of one million four hundred fifty-five thousand four hundred ninety-seven dollars, and fifty-six cents (\$1,455,497.⁵⁶) that was issued by Driggs Title Agency, Inc. and payable to 518 Garces Avenue, LTD and AVE, Inc. dated for April 16th, 2019 bearing check number 561750.

6. Defendant took the stolen check to Mobile, Alabama and opened an account in the name of AVE, Inc. at Renasant Bank on April 26th, 2019. The account number was 8015696011. Renasant Bank did not follow usual banking procedure to see the corporate record book and examine the charter issued by the state, the IRS letter assigning the Federal Tax Number, the two most recent years of minutes from the Stock Holder's meetings, and the Board of Directors meetings. Renasant Bank did not get a local address for the Defendant when he opened the account. Renasant Bank is still holding the one million four hundred fifty-five thousand four hundred ninety-seven dollars, and fifty-six cents (\$1,455,497.⁵⁶.)

7. Defendant signed an agreement to sell 7821 I.-H. 35 in Austin, Texas that is owned by AVE, Inc. The real estate agreement is with Lucian Morehead, of Asterra Real Estate Company. Neither the Defendant, nor Lucian Morehead will release any information about a potential sale.

8. The Defendant attempted to sell 6227 North Travel Center Drive, Tucson Arizona 85741 on July 10th, 2019. The property is owned by Harris News, Inc., a subsidiary of AVE, Inc., a Texas Corporation.

9. Defendant took five hundred eighty-five thousand dollars (\$585,000.⁰⁰) from Rex-Temple, Inc. subsidiaries Doctor John's, Inc. a Colorado Corporation, and Zone D'Erotica, Inc., a Nebraska Corporation's bank accounts in November 2018.

10. Defendant claims he owns East Bay, Inc., a Texas Corporation, Rex-Temple, Inc., a Texas Corporation, Doctor John's Inc., an Iowa Corporation, Harris News, Inc., an Arizona Corporation, Harris News, Inc., a New Mexico Corporation, and Bokonon, LLC., a Texas Limited Liability Corporation.

Prior Case Law

The United States District Court for the Western District of Texas case number w:03-CR-197(4) H judgement dated August 16th, 2004 found that John A. Coil was not the owner of Nobby Lobby, Inc., Rex-Temple, Inc., Ave, Inc., and any successor corporations and

their subsidiaries, A&Kola, Inc., East Bay, Inc., Everglades Video, Inc., Fantasy Theater, Inc., Arcadia Enterprises, Inc., and Doctor John's, Inc. That John A. Coil was a false nominee for the true owner, John Kenneth Coil.

In a case related to an injunction in New Braunfels, Texas, a Texas court in case 2002-859 ruled that John A. Coil is the alter-ego of the actual owner, John Kenneth Coil.

Prayer

Wherefore Plaintiff prays that the court issue a citation for Defendant to appear and answer, and that Plaintiff be awarded judgement against the Defendant for the following:

A. Money damages in the amount of five hundred eighty-five thousand dollars for money converted.

B. Money damages in the amount of one million four hundred fifty-five thousand four hundred ninety-seven dollars, and fifty-six cents stolen from AVE, Inc.

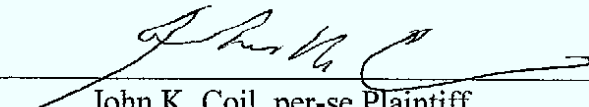
C. Interest at the highest rate allowable by the State of Illinois for a judgement.

D. A ruling that follows the Federal court and the State of Texas court that John K. Coil is the owner of all of the Corporations, including any Corporation that succeeded through purchase or creation as a newly established Corporation.

E. Recognition of the ownership rights of John K. Coil's wife, Paula Katherine Coil, gathered through 28 years of marriage.

F. Exemplary damages in an amount to be determined by the trier of fact.

Respectfully submitted



John K. Coil, per-se Plaintiff

**IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS**

**JOHN KENNETH COIL, individually and)
as sold owner of AVE, INC., and AVE,)
INC., a Texas Corporation with its)
principle place of business in Illinois,)**

Plaintiff,

v.

JOHN ALTAIRE COIL,

Defendant.

Case No. 19-L-001095

FIRST AMENDED COMPLAINT

Comes now Plaintiff John Kenneth Coil, individually and on behalf of AVE, Inc., a
Texas Corporation with its principle place of business in Illinois, and AVE, Inc.,

COUNT I

1. That Plaintiff John Kenneth Coil ("JKC") is the sole shareholder in AVE, Inc., a Texas Corporation with its principle place of business in Wood River, Madison County, Illinois.
2. That Plaintiff AVE, Inc., ("AVE") is a Texas Corporation, with its principle place of business in Wood River, Madison County, Illinois.
3. That Defendant John Altaire Coil ("JAC") is the son of JKC, and suffers from severe mental issues, and has on more than two occasions, stolen significant money from Plaintiff AVE, and claimed at various times to own and/or purported to act for or under the authority of Plaintiff AVE. That JAC has variously claimed to be a citizen and resident of, and may or may not actually resident in Illinois, Colorado, Texas or Florida, depending on the day. At present, he is believed to reside in Dallas, Texas, and have a

Texas Driver's license, but he has also claimed residence at Mobile Alabama, at an address that is not believed to actually exist.

4. That Defendant JAC neither owns any shares of stock of AVE, nor does he have any legal or equitable interest in said company.
5. That JCK owns all shares of stock in AVE, and owns all legal and equitable interests in said AVE.
6. Contrary to the rights of Plaintiff JKC, as legal and equitable owner of AVE, Defendant JAC has, on multiple occasions stolen money from AVE, purported to sell property of AVE, purported to change registered agents of AVE, purported to enter into contracts on behalf of AVE, and generally acted contrary to the rights of JKC and AVE.
7. That as a result, Plaintiffs JCK and AVE, find themselves embroiled in lawsuits, in multiple states, by persons that JAC has interacted with, claiming ownership or other affiliated with AVE.
8. That JCK and AVE, have no adequate remedy at law.

WHEREFORE, Plaintiff JCK humbly requests that this Court find him to be the sole and exclusive shareholder and owner of AVE, Inc., a Texas Corporation with its principle place of business in Wood River, Illinois, and that John Altaire Coil, is devoid of any and all shares of stock of Ave, Inc., has no legal or equitable interest in AVE., Inc, and that John Altaire Coil has no office, title or authority of or under AVE, Inc.

COUNT II

1 – 8. Plaintiffs adopt and incorporate paragraphs 1 through 8 above.

9. That Defendant JAC had a duty not to claim ownership or affiliated with AVE, Inc., when none existed, and not to steal funds from AVE, Inc., including stealing them from Wood River, Illinois, at AVE, Inc., headquarters.

10. In violation of this duty, Defendant AVE acted as heretofore alleged.

11. As a proximate cause of the foregoing, Plaintiff AVE, Inc., has been injured in an amount well in excess of \$50,000.00.

WHEREFORE, Plaintiff AVE, Inc., humbly requests that this Honorable Court enter judgment in its favor, and against Defendant John Altaire Coil, in a amount of compensatory damages, in excess of \$3,000,000.00 (three million US dollars), plus punitive damages three times that of compensatory damages.

COUNT III

1 – 8. Plaintiffs adopt and incorporate paragraphs 1 through 8 above.

9. That without an injunction, Defendant JAC will continue to act contrary to the interests of Plaintiff, AVE, Inc.

WHEREFORE, Plaintiff AVE, Inc., humbly requests that this Honorable Court enter judgment in its favor, and against Defendant John Altaire Coil, and enjoin Defendant John Altaire Coil, from (a) claiming any ownership or other interest in AVE, Inc., (b) enjoining Defendant John Altaire Coil from transferring, selling, or encumbering the title of any real property owned or titled in the name of AVE, Inc., (c) enjoining John Altaire Coil from opening or maintaining any bank or other account in the name of AVE, Inc., (d) enjoining John Altaire Coil from entering upon any real property owned or possessed by Ave, Inc. and (e) enjoining John Altaire Coil from changing registered agents or addresses of AVE, Inc., or purporting to hire persons, including lawyers, for AVE, Inc.

IF YOU FAIL TO TIMELY RESPOND TO THIS COMPLAINT, THE COURT MAY GRANT ALL OF THE RELIEF REQUESTED AGAINST YOU, INCLUDING DECLARATORY, INJUNCTIVE AND MONETARY RELIEF. PLAINTIFF IS ASKING FOR SEVERAL MILLION DOLLARS IN MONETARY RELIEF, AS WELL AS A BROAD INJUNCTION AGAINST YOU.

Dated: September 23, 2020

Respectfully Submitted,
John Kenneth Coil

By: Thomas G. Maag

Thomas G. Maag #6272640
Maag Law Firm, LLC
22 West Lorena Avenue
Wood River, IL 62095

Phone: 618-216-5291
tmaag@maaglaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date, he mailed the foregoing document to the following:

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John Altaire Coil
12159 Padgett Switch Road
Irvington, AL 36544

John Altaire Coil
2011 Cedar Springs Road #405
Dallas, TX 75201-1523

Dated: 9-23-2020

By: Thomas G. Maag

This form is approved by the Illinois Supreme Court and is required to be accepted by the Third Judicial Circuit, Madison County Illinois

STATE OF ILLINOIS, CIRCUIT COURT		AFFIDAVIT OF SERVICE OF SUMMONS AND COMPLAINT/PETITION	
Madison COUNTY			
Instructions Enter above the county name where the case was filed. Enter your name as Plaintiff/Petitioner. Enter the name of the person you are suing as Defendant/Respondent. Enter the Case Number given by the Circuit Clerk.		JohnK Coil and AVE, Inc Plaintiff / Petitioner (First, middle, last name) v. John Altaire Coil Defendant / Respondent (First, middle, last name)	
		19-L-1095 Case Number	

Stop. Do not complete the form. The sheriff will fill in the form.

DO NOT complete this section. The sheriff will complete it.

My name is Joseph Justin Williamson and I swear under oath
 First, Middle, Last

that I served the Summons and Complaint/Petition on the Defendant/Respondent

John Altaire Coil as follows:
 First, Middle, Last

- ☒ Personally on the Defendant/Respondent:
 Male: ☒ Female: ☐ Approx. Age: 35 Hair Color: Dark Blond
 Height: 6' Weight: _____
 On this date: 10/6/2020 at this time: 2:33 ☐ a.m. ☒ p.m.
 Address: 2011 Cedar Springs
 City, State, ZIP: DALLAS, TX 75021
- ☐ At the Defendant/Respondent's home:
 On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
 Address: _____
 City, State, ZIP: _____
 And left it with: _____
 First, Middle, Last
 Male: ☐ Female: ☐ Approx. Age: _____
 and by sending a copy to this defendant in a postage-paid, sealed envelope to the above address on _____, 20____
- ☐ On the Corporation's agent, _____
 First, Middle, Last
 On this date: _____ at this time: _____ ☐ a.m. ☐ p.m.
 Address: _____
 City, State, ZIP: _____

Enter the Case Number given by the Circuit Clerk: 19-L-1095

DO NOT complete
this section. The
sheriff, or private
process server will
complete it.

By:

Signature

Joseph Justin Williamson
Print Name

FEES

By certified/registered

\$

Service and Return

\$

Miles:

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Total

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